

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

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LUIS ADRIANO,

Plaintiff(s), Index No.: 07cv4445

-against-

**NOTICE OF ADOPTION**

**1:21-MC-00102-AKH**

90 CHURCH STREET LIMITED PARTNERSHIP,  
AMBIENT GROUP, INC., AMERICAN  
EXPRESS BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC.,  
BANKERS TRUST COMPANY, BATTERY  
PARK CITY AUTHORITY, BELFOR USA  
GROUP, INC., BFP ONE LIBERTY PLAZA CO.,  
LLC., BFP TOWER C CO. LLC., BFP TOWER C  
MM LLC., BLACKMON-MOORINGSTEAMATIC  
CATASTOPHE, INC. D/B/A BMS  
CAT, BOSTON PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS,LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., BT PRIVATE  
CLIENTS CORP., DEUTSCHE BANK TRUST  
COMPANY, DEUTSCHE BANK TRUST  
COMPANY AMERICAS, DEUTSCHE BANK  
TRUST CORPORATION, GENERAL RE  
SERVICES CORP., HILLMAN  
ENVIRONMENTAL GROUP, LLC., LEHMAN  
BROTHERS HOLDINGS INC., LEHMAN  
BROTHERS, INC., LEHMAN COMMERCIAL  
PAPER, INC., MCCLIER CORPORATION,  
NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, INC., NEW LIBERTY PLAZA LP,  
NEW YORK CITY ECONOMIC  
DEVELOPMENT CORPORATION, NEW  
YORKCITY INDUSTRIAL DEVELOPMENT  
AGENCY, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT CORPORATION, ONE  
LIBERTY PLAZA, STRUCTURE TONE (UK),  
INC., STRUCTURE TONE GLOBAL SERVICES,  
INC., THE BANK OF NEW YORK TRUST

COMPANY NA, THE BOARD OF MANAGERS  
OF THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO  
#1178), TISHMAN INTERIORS CORPORATION,  
TRAMMELL CROW COMPANY, TRAMMELL  
CROW CORPORATE SERVICES, INC.,  
TUCKER ANTHONY, INC., WFP ONE LIBERTY  
PLAZA CO., L.P., WFP ONE LIBERTY PLAZA,  
CO. GP, CORP., WFP RETAIL CO. G.P. CORP.,  
WFP RETAIL CO. L.P., WFP TOWER A CO.,  
WFP TOWER A CO. G.P. CORP., WFP TOWER  
A. CO., L.P., AND WORLD FINANCIAL  
PROPERTIES, L.P., ET AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for its response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York  
September 11, 2007

Yours, etc.,

**SAM ROSMARIN, PLLC**



By: \_\_\_\_\_  
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**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the  
**SERVICE RIDER**



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Cristina A. Villani

Sworn to before me this  
11th day of September 2007



Charlene S. Rogers  
Notary Public  
No. 01RO 4703494  
Qualified in Westchester County  
Commission Expires 11/30/09